

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

MAR 02 2020

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Victor Manuel Lambarría Roblez, USC

YOB: 2001

Paulita Gallegos Roblez, USC

YOB: 1977

Case No. M-20-0564-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 29, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 841

Knowingly or intentionally possess with intent to distribute or dispense, a controlled substance, 61.02 kilograms of Methamphetamine (Schedule II) and 2.6 kilograms of Heroin (Schedule I)

21 USC § 952

Knowingly and intentionally illegally import into the United States approximately 61.02 kilograms of Methamphetamine (Schedule II) and 2.6 kilograms of Heroin (Schedule I)

This criminal complaint is based on these facts:

See Attachment "A"

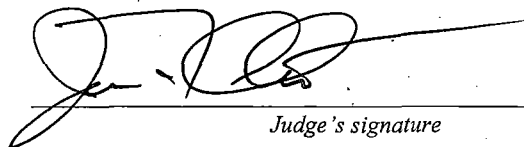
☒ Continued on the attached sheet.approved by Scott Greenbaum, AUSA
Jeb J. Hall 3/2/2020

Complainant's signature

Jaris D. Jones, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/02/2020 - 9:01 a.m.

Judge's signature

City and state: McAllen, Texas

Hon. Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

"ATTACHMENT A"

I am a Special Agent (SA) of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On February 29, 2020, VICTOR Roblez and PAULITA Roblez entered the United States through the Hidalgo, Texas Port of Entry operating a Toyota 4Runner.
2. At the Hidalgo Port of Entry, PAULITA gave negative declarations for narcotics, weapons, ammunition and monetary instruments in excess of \$10,000 to Customs and Border Protection (CBP) officers.
3. PAULITA stated she was travelling from Mexico to Dallas, Texas.
4. PAULITA (the driver of the vehicle), VICTOR (a passenger in the vehicle) and the vehicle were referred for a secondary inspection. During the secondary inspection, a Narcotics Detection Dog (NDD) alerted to the presence of narcotics in the tires of the vehicle.
5. CBP officers utilized a Z-Portal scan, which revealed anomalies within all four tires. Further inspection of the tires resulted in the discovery of twenty-four (24) packages concealed in after-market compartments.
6. The packages field tested positive for the properties of methamphetamine and heroin, both controlled substances. The packaged methamphetamine's weight totaled 61.02 kilograms; the packaged heroin's weight totaled 2.6 kilograms.
7. Homeland Security Investigation (HSI) Special Agents, advised PAULITA and VICTOR each of their Miranda warnings in the English language, both stated they understood, and both waived in writing.
8. Post Miranda, VICTOR stated he was aware there was a controlled substance inside the tires of the vehicle, but he did not know the amount or type of controlled substance. The vehicle was destined for Dallas, Texas.
9. Post Miranda, PAULITA stated she was aware there was a controlled substance inside the tires of the vehicle, but she did not know the amount or type of controlled substance. PAULITA was to be paid approximately \$10,000.00 upon delivery of the vehicle.